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AUTH. NAME AUTHOR AFFILIATION

IDE, W.E. Arizona Public Service Co. (formerly Arizona Nuclear Power

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SUBJECT: Forwards revised Bases pages, providing addl discussion of options available to exit required action G of TS 3.8.1 & revised page for TS 3.3.7, in response to NRC RAI re proposed amend to TS 3.8.1 & 3.3.7.

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Palo Verde Nuclear
Generating Station

William E. Ide
Vice President
Nuclear Production

TEL (623) 393-6116
FAX (623) 393-6077

Mail Station 7602
P.O. Box 52034
Phoenix, AZ 85072-2034

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September 29, 1999

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- References:
1. Letter 102-04224-JML/SAB/RKR, dated December 16, 1998, from J. M. Levine, APS, to NRC, "Request for Amendment to Technical Specification (TS) 3.8.1, AC Sources - Operating and 3.3.7, Diesel Generator (DG) - Loss of Voltage Start (LOVS)"
 2. Letter 102-04310-WEI/SAB/RKR, dated July 16, 1999, from W. E. Ide, APS, to NRC, "Response to NRC Request for Additional Information Regarding Proposed Amendment to Technical Specifications (TS) 3.8.1, AC Sources - Operating and 3.3.7, Diesel Generator (DG) - Loss of Voltage Start (LOVS)"

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Docket Nos. STN 50-528/529/530
Response to NRC Request for Additional Information Regarding
Proposed Amendment to Technical Specifications (TS) 3.8.1, AC
Sources - Operating and 3.3.7, Diesel Generator (DG) - Loss of
Voltage Start (LOVS)**

In a letter to Arizona Public Service Company (APS) dated June 14, 1999, additional information regarding APS's request for an amendment (reference 1) to Technical Specifications 3.8.1, "AC Sources - Operating" and 3.3.7, "Diesel Generator (DG) - Loss of Voltage Start" was requested by the NRC. In the response to the NRC request for additional information (reference 2), APS agreed to provide 1) the results of the voltage criteria review for the spray pond pump house exhaust fans discussed in the response to NRC Request 3, 2) the Bases change discussed in the response to NRC Request 10, and 3) the Technical Specification changes discussed in the responses to NRC Requests 11 and 12.

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Responses to NRC Request for Additional Information
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In response to NRC Request 3 (reference 2), APS has completed the review of electrical safety equipment, including the spray pond pump house exhaust fans and has determined that safety equipment will meet their voltage criteria if offsite voltage is at a point just above a value at which the degraded voltage relay (DVR) would actuate.

In response to NRC Request 10 (reference 2), attached are the revised Bases pages that provide additional discussion of the options available to exit Required Action G of Technical Specification 3.8.1, "AC Sources – Operating."

In response to NRC Requests 11 and 12, attached is the revised page for Technical Specification 3.3.7, "Diesel Generator (DG) – Loss of Voltage Start (LOVS)" surveillance requirement (SR) 3.3.7.3. In addition to the changes described in Reference 1, a minimum time delay of ≥ 28.6 seconds has been added to the Degraded Voltage function in SR 3.3.7.3a. The SR 3.3.7.3b requirements for the Loss of Voltage relays have also been revised. A minimum time delay of ≥ 2.0 seconds has been added to the time delay at zero volts. The time delay at the maximum voltage of 2929.5 volts is being reinserted in the SR. The time delay for the maximum voltage is also being revised from ≤ 11.4 seconds to a time delay with a range of ≥ 10.3 seconds and ≤ 12.6 seconds. The time delays are based on a ± 10 percent tolerance band.

APS has reviewed the initial Technical Specification change request (reference 1) and has determined that these changes do not affect the original "No Significant Hazards Considerations." The changes only affect the description of the specific changes as described above.

No commitments are being made to the NRC by this letter.

Please contact Mr. Scott Bauer at (623) 393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,



Attachments

WEI/SAB/RKR/mah

cc: E. W. Merschoff
N. Kalyanam
J. H. Moorman
A. V. Godwin



Age Group	Percentage of Respondents
18-29	85%
30-49	80%
50-69	75%
70+	70%

[illegible]

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, W. E. Ide, represent that I am Vice President Nuclear Production, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.

W. E. Ide
W. E. Ide

Sworn To Before Me This 29th Day Of September, 1999.

Nora E. Meador
Notary Public

My Commission Expires

April 6, 2003



